

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

FILED
MAR 01 2010
U.S. DISTRICT COURT
INDIANAPOLIS, INDIANA

UNITED STATES OF AMERICA,)
 Plaintiff,)
)
 v.)
)
DALE RUSSELL,)
 Defendant.)

Cause No. 1:08-cr-04-SEB-KPF

DEFENDANT’S TENDERED VOIR DIRE QUESTIONS

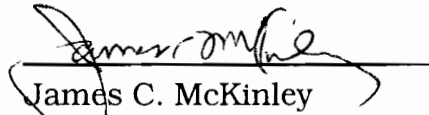
Defendant Dale Russell, by counsel, respectfully moves the Court to make the following inquiry of the prospective jurors:

1. The nature of any moral, religious or personal objections the prospective juror may have to the display of:
 - a. sexually explicit material;
 - b. depictions of full frontal nudity;
 - c. depictions of nudity in children.
2. Whether the juror’s moral, religious or personal beliefs would interfere with his/her ability to:
 - a. view sexually explicit material;
 - b. discuss the nature of such material with fellow jurors, including those of the opposite sex; and
 - c. consider such material with an open mind.
3. Whether any juror, the jurors family or close friends have ever been the victim of a sexual offense. If so, what impact does have on the juror’s ability to fairly

consider the evidence in this case?

4. The nature or any information and/or publicity to which the juror has been exposed regarding sexually explicit material and/or alleged child pornography.
5. What periodicals or newspapers, if any, does the juror commonly read.

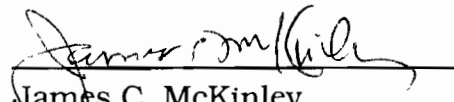
Respectfully submitted,



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CERTIFICATE OF SERVICE

The foregoing was hand delivered to Asst. U.S. Attorneys Gayle Helart and Brant Cook this 1st day of March, 2010.



James C. McKinley